

**IN THE UNITED STATES DISTRICT COURT NORTHERN
DISTRICT OF ILLINOIS, EASTERN DIVISION**

COMBINED SELECTION GROUP, LTD.)	
)	
Plaintiff,)	Case No. 23-cv-02312
)	
v.)	Hon. John F. Kness
)	
)	Magistrate Judge Gabriel A. Fuentes
)	
IFS NORTH AMERICA, INC.,)	
)	
Defendant.)	

SUPPLEMENTAL JOINT STATUS REPORT AS OF APRIL 4, 2024

This Supplemental Joint Status Report is submitted by the parties in compliance with the Court's direction to provide a report as to the status of discovery and any request for a settlement conference with the Court as of April 4, 2024. The Parties have again conferred as required by Rule 26(f), and jointly submit the following discovery and status report. The parties inform the Court that:

- 1) The Parties have conducted and completed all depositions of anticipated witnesses.
- 2) The Parties do not intend to retain and, therefore, depose any expert witnesses;
- 3) In the wake of the completed discovery each of the Parties is considering the possibility of cross motions for summary judgment and, subject to anticipated confirmation from their respective decision makers, the Parties are requesting that the disposition of any such dispositive motions be conducted in this Court.
- 4) While the parties continue to remain open to continue to explore and consider the possibility of settlement, at this time the parties are not yet requesting another settlement conference in which the Court will be asked to participate.

- 5) After continued consultation the Parties are prepared to submit an additional Joint Status Report on or before noon on April 12, 2024, confirming their intent to file dispositive motions in this Court and setting forth a proposed briefing schedule.

Respectfully submitted,

COMBINED SELECTION
GROUP, LTD.

/s/ Thomas J. Dillon
One of the attorneys for the Plaintiff,
COMBINED SELECTION GROUP LTD.

Thomas J. Dillon (ARDC #3124223)
Kyle T. Dillon (ARDC #6323818)
MCFADDEN & DILLON, P.C.
120 South LaSalle Street, Suite 1920
Chicago, Illinois 60603
(312) 201-8300
t.dillon@mcdillaw.com

IFS NORTH AMERICA, INC.

/s/ Ross M. Good
One of the attorneys for Defendant, IFS
NORTH AMERICA, INC.

Ross M. Good, Esq. David A.
Eisenberg, Esq. LOFTUS &
EISENBERG, LTD.
161 N. Clark, Suite 1600
Chicago, Illinois 60601
T: 312.899.6625
ross@loftusandeisenberg.com